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December 14, 2021

VIA ELECTRONIC FILING

Honorable Tonianne J. Bongiovanni, U.S.M.J.
United States District Court
District of New Jersey
402 East State Street
Trenton, New Jersey 08608

Re: Todd Stathum v. Barry Nadrowski, et al.
Docket Number: 3:15-cv-05502
****Settlement Discussions Subject to FRE**

Dear Judge Bongiovanni:

As Your Honor is aware, our office represents plaintiff, Todd Stathum (“Plaintiff”), in the above matter. We write to provide the Court with an update on the status of settlement discussions between the parties.

Since our most recent discussions with the Court, we have spoken with Plaintiff about the updated settlement terms offered by the defendants. While he remains concerned with defendants’ continued compliance with some of the settlement terms, he has agreed to review a draft proposed settlement agreement. As such, we are preparing same for his review – and intend to have a draft to him by tomorrow, December 14. We anticipate being able to discuss the draft with him by next week and hopefully can then provide same to defendants’ counsel for review and comments.

Based on the foregoing and the upcoming year-end holidays, Plaintiff respectfully requests that the Court schedule a new date for an update in early January. This would allow the parties to work on reaching agreement on a final settlement agreement. Should the Court have any questions regarding this matter, please do not hesitate to contact our office.



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We thank the Court for its continued attention and assistance with this matter.

Respectfully submitted,

GENOVA BURNS LLC

/s/ Maria R. Fruci

MARIA R. FRUCI

MRF/HCC:cp
c: Fay L. Szakal, Esq. (via electronic mail)

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